

EXHIBIT A



Notice of Service of Process

null / ALL
Transmittal Number: 21329901
Date Processed: 03/25/2020

Primary Contact: Marc P. Clements
Jarden Corporation
3600 North Hyrdaulic Street
Wichita, KS 67219

Entity:	Sunbeam Products, Inc. Entity ID Number 3672673
Entity Served:	Sunbeam Products, Inc
Title of Action:	Stella Benson vs. Sunbeam Products Inc.
Matter Name/ID:	Stella Benson vs. Sunbeam Products Inc. (10140868)
Document(s) Type:	Summons/Complaint
Nature of Action:	Product Liability
Court/Agency:	St. Louis City Circuit Court, MO
Case/Reference No:	2022-CC00591
Jurisdiction Served:	Missouri
Date Served on CSC:	03/23/2020
Answer or Appearance Due:	Within 30 days of 03/20/2020
Originally Served On:	CSC
How Served:	Regular Mail
Sender Information:	Lauren E. Bronson 314-878-8200

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS, MISSOURI
TWENTY-SECOND JUDICIAL CIRCUIT

STELLA BENSON,)	
)	CAUSE No. 2022-CC00591
PLAINTIFF,)	
VS.)	DIVISION No. 1
)	
SUNBEAM PRODUCTS, INC.,)	
)	
DEFENDANT.)	

NOTICE and ACKNOWLEDGEMENT FOR SERVICE BY MAIL

TO: SUNBEAM PRODUCTS, INC.
SERVE REGISTERED AGENT:
CSC LAYERS INCORPORATING
SERVICE COMPANY
221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

The enclosed summons and petition are served pursuant to Missouri Supreme Court Rule 54.16.

You may sign and date the acknowledgment part of this form and return one copy of the completed form to the sender within thirty days of March 20, 2020.

If you are served on behalf of a corporation, unincorporated association, including a partnership, or other entity, you must indicate under your signature your relationship to that entity. If you are served on behalf of another person and you are authorized to receive process, you must indicate under your signature your authority.

If you do not complete and return the form to the sender within thirty days, you or the party on whose behalf you are being served may be required to pay any expenses incurred in serving a summons and petition in any other manner permitted by law.

If you do complete and return this form, you or the party on whose behalf you are being served must answer the petition within thirty days of the date you sign the acknowledgement below. If you fail to do so, judgment by default may be taken against you for the relief demanded in the petition.

I DECLARE, UNDER PENALTY OF PERJURY, THAT THIS NOTICE WAS MAILED ON March 20, 2020.

Maria S. Benson /MS
Signature

ACKNOWLEDGMENT OF RECEIPT OF SUMMONS AND PETITION

I declare, under penalty of filing a false affidavit, that I received a copy of the Summons and of the Petition in the above captioned matter.

Date

Signature


Relationship to Entity/Authority to Receive Service of Process



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: REX M BURLISON	Case Number: 2022-CC00591	
Plaintiff/Petitioner: STELLA BENSON	Plaintiff's/Petitioner's Attorney/Address LAUREN ELIZABETH BRONSON 2300 WEST PORT PLAZA DR ST LOUIS, MO 63146	
Defendant/Respondent: SUNBEAM PRODUCTS INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Pers Injury-Prod Liab		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: SUNBEAM PRODUCTS INC		
Alias:		
CSC LAWYERS INC SERVICE CO 221 BOLIVAR STREET JEFFERSON CITY, MO 65101		COLE COUNTY, MO
 CITY OF ST LOUIS	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>March 17, 2020</p> <p>_____ Date</p> <p>_____ Clerk</p>	
Further Information:		

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$_____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS, MISSOURI
TWENTY-SECOND JUDICIAL CIRCUIT**

STELLA BENSON,)
)
) CAUSE No.)
)
PLAINTIFF,)
)
)
VS.)
) DIVISION No. 1)
)
)
SUNBEAM PRODUCTS, INC.,)
) TRAIL BY JURY DEMANDED)
)
A CORPORATION,)
)
SERVE REGISTERED AGENT BY MAIL:)
)
CSC LAYERS INCORPORATING)
)
SERVICE COMPANY)
)
221 BOLIVAR STREET)
)
JEFFERSON CITY, MO 65101)
)
)
DEFENDANTS.)

PETITION FOR PERSONAL INJURIES

Comes now Plaintiff, Stella Benson, and for her cause of action against the defendant,
states and alleges:

1. Defendant Sunbeam Products, Inc. is a corporation organized and existing under and by virtue of law, and at all times mentioned herein operating by and through its agents, servants and employees acting within the course and scope of their employment, agency, apparent agency, and service.
2. At all times mentioned, defendant is and was doing business as Jarden Consumer Solutions.
3. At all times mentioned, defendant sold approximately 520,000 Mr. Coffee appliances between 2011 and 2012.

4. Defendant received numerous complaints and reports of the Mr. Coffee brewing chamber opening due to steam pressure and exploding and expelling hot water and coffee grounds on users and consumers who suffered burn injuries to their face, upper torso and hands.

5. Despite knowledge that the Mr. Coffee Single Cup Brewing System, Model BVMC-KG1 series (hereafter, "MR. COFFEE") contained a defect that exposed users and others in the vicinity to explosion and expelling of hot water and coffee grounds and created a substantial risk of burns and harm, defendant failed to timely and/or adequately notify purchasers, users, the public or the Consumer Product Safety Commission as required and thereby violated the Consumer Product Safety Act.

6. Defendant failed to timely and/or adequately notify or warn purchasers and users of MR. COFFEE of the defective unreasonably dangerous condition of the MR. COFFEE appliance.

7. Defendant failed to timely and/or adequately perform a recall of the defective MR. COFFEE appliance.

8. On or about April 26, 2018, plaintiff was using in a reasonably anticipated manner a MR. COFFEE in St. Louis, Missouri, which she received as a gift, when it exploded expelling boiling scalding hot water and coffee beans onto her face and body causing her to suffer and sustain serious burns, and to suffer and sustain great pain, anguish of mind, loss of the pleasures and enjoyment of life and damages which are permanent and progressive and in excess of Twenty Five Thousand Dollars (\$25,000.00).

9. The explosion was the direct result of the defective unreasonably dangerous condition of the MR. COFFEE product as designed, manufactured and sold; and the negligence

and carelessness of defendant in the marketing, sale, design and manufacture of the MR. COFFEE, and in the failure to timely and/or adequately notify purchasers and users of the defect and to timely and/or adequately perform a recall of the defective MR. COFFEE appliance.

10. Defendant has publicly admitted, and has admitted to the United States Consumer Product Safety Commission, that it failed to timely disclose the existence of the dangerous condition of MR. COFFEE.

11. The aforementioned conduct of defendant was outrageous, willful, wanton and in conscious disregard for the safety of consumers and users of the MR. COFFEE appliance which defendant through its advertising and marketing represented as being safe; punitive damages should therefore be assessed against defendant to punish defendant and to deter defendant and others from like conduct in the future.

WHEREFORE, plaintiff prays judgment against the defendant for such actual and punitive damages as are fair and reasonable, together with her costs and statutory interest, if any.

NEWMAN BRONSON & WALLIS

By: Lauren E. Bronson

LAUREN E. BRONSON MO Bar #68649

MARK I. BRONSON MO Bar #23183

2300 West Port Plaza Drive

St. Louis, MO 63146-3213

(314) 878-8200

FAX (314) 878-7839

lbronson@newmanbronson.com

mbronson@newmanbronson.com

ATTORNEYS FOR PLAINTIFF